



February 13, 2017

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th St., SW, Room TW-A325
Washington, DC 20554

RE: CG Docket No. 02-278

Dear Ms. Dortch:

Progressive Financial Services, Inc. agrees with the comments submitted by the National Council of Higher Education Resources regarding the pending petition to reconsider the final rule and order released on August 11, 2016 implementing the Bipartisan Budget Act of 2015, which set limitations on cell phone calls that can be made to borrowers under the Telephone Consumer Protection Act (TCPA) in the servicing and collection of federally-held or -guaranteed debt.

Specifically, we agree with the following:

- The three-call attempt-per-thirty-day limit in the rule is arbitrary and so restrictive that it completely thwarts the intent of Congress;
- The one-call attempt limit to reassigned numbers where the caller has no knowledge that the number has been reassigned renders the language included in the Budget Act meaningless;
- The rule goes well beyond restricting or limiting the number and duration of calls and, thus, is impermissibly broad.

Thank you for allowing us to share our view.

A handwritten signature in blue ink, appearing to read "Carl Perry", is located below the "Thank you" text. The signature is fluid and cursive.

Carl Perry
Senior Vice President
Progressive Financial Services, Inc
2722 Railroad Circle
Aberdeen, SD 57401
Cell: 800-585-4986
cperry@progressivefinancial.com
www.progressivefinancial.com